



## THE RADICE LAW FIRM

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May 23, 2025

**Via ECF**

The Honorable Stacey D. Adams, United States Magistrate Judge  
United States District Court for the District of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street, Room 4015  
Newark, New Jersey 07101

Re: *Kaplan, et al., v. Mashinsky, et al.*  
Case No. 2:22-cv-04560-SDW-SDA

Dear Judge Adams,

I am counsel for the Lead Plaintiffs in the above captioned action and write on behalf of all parties pursuant to the Court's March 28, 2025 Order directing the parties to submit a joint letter in advance of the status conference to be held on May 28, 2025 [Dkt. No. 129].

In advance of the status conference, the parties have met and conferred and have agreed upon a briefing schedule for Defendants' anticipated motion to stay and/or motion to transfer:

EVENT	DATE
Defendants' Opening Motion	To be filed on or before June 25, 2025
Plaintiffs' Opposition Brief	To be filed on or before July 9, 2025
Defendants' Reply Brief	To be filed on or before July 23, 2025
Hearing	Subject to the Court's first availability

We thank the Court for its continued consideration of this matter.

Sincerely,

/s/ John Radice

John Radice (Bar No. 023612004)  
*Liaison Counsel*

CC: Counsel for all parties (via ECF)

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on May 23, 2025, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

DATED: May 23, 2025

/s/ John Radice  
JOHN RADICE (Bar No. 023612004)